

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HAYDN ZEIS, Administrator of the Estate of  
JORDN MILLER,

Plaintiff,

vs. CASE NO. 5:16-cv-02331-JRA  
JUDGE ADAMS

SPRINGFIELD TWP., OHIO, et al.,

Defendants.

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Deposition of SHAWN DEWOLF, taken as if  
upon cross-examination before Lisa M. Wright, a  
Notary Public within and for the State of Ohio, at  
the Springfield Township Police Department 2465,  
Canfield Road, Akron, Ohio, at 10:00 a.m. on  
Wednesday, May 31, 2017, pursuant to notice and/or  
stipulations of counsel, on behalf of the Plaintiff  
in this cause.

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1           So, yes, sometimes we don't have that  
2           information. Actually, probably most of the time  
3           we don't have that information of what is making  
4           him, him or her, act that way. We just see that  
5           they're acting that way, and it doesn't fit how  
6           they normally do per bystanders or family, or if  
7           anybody knows who this person -- like they dealt  
8           with them before.

9           Q. So if you see a person, or you get a report that a  
10           person is acting in a manner that fits this  
11           agitated behavior profile and they're not calming  
12           down, one of the options then is to medicate this  
13           person with a sedative so that they don't continue  
14           to struggle, wrestle, do things like that; is that  
15           fair?

16          A. Yes.

17          Q. Okay. You talked about sedative, a sedative  
18           medication that you have available?

19          A. Yes.

20          Q. What medication do you have available at  
21           Springfield Township for this, for calming a person  
22           with this kind of agitated state?

23          A. We have ketamine, k-e-t-a-m-i-n-e.

24          Q. And ketamine is really, kind of has become kind of  
25           the gold standard drug for responding to excited

1 delirium, fair?

2 A. It is, yes.

3 Q. And ketamine, if I understand it, is actually an  
4 anesthetic?

5 A. Yes, it has those properties.

6 Q. Okay.

7 A. They do use it in animals for surgical procedures  
8 when it's neutering or spraying they do.

9 Q. Okay. And tell me what is the -- how do you  
10 administer ketamine? Is it intramuscular  
11 injection?

12 A. Yes.

13 Q. And for intramuscular injection do you just try to  
14 get into a large piece of tissue?

15 A. The bigger the better. But the more appropriate  
16 place is probably going to be a shoulder just  
17 because of access.

18 Q. Okay. And can you give me an idea -- we don't have  
19 this on video, but just an idea of kind of like the  
20 needle, how big it is, what it looks like?

21 A. The syringe is, I don't know, three inches or so.  
22 The needle is about an inch and a half.

23 Q. Okay. And then you say you put it in a shoulder.  
24 Is it the back of the shoulder?

25 A. The deltoid here.

1 specific like that?

2 A. Nothing specific as far as their location.

3 Q. Okay. Just that there were three officers near his  
4 body?

5 A. I'm not even positive if there, what the count was.

6 Q. Okay.

7 A. I don't know that.

8 Q. Okay. Do you remember anything about Jordn's  
9 position, supine, prone, on his side?

10 A. Face down and handcuffed.

11 Q. Okay.

12 A. So that would be with the arms, you know,  
13 handcuffed behind him.

14 Q. Right. And then when you arrived, did you or one  
15 of your colleagues roll Jordn over onto his back or  
16 side?

17 A. Yes.

18 Q. Did you have to remove, someone have to remove, the  
19 handcuffs first?

20 A. We did remove the cuffs, yeah. Between us rolling  
21 him over and then the officers unlocking the cuffs,  
22 yes.

23 Q. Okay.

24 A. And that is indicated on my report.

25 Q. And then in terms of removing the sweatshirt,

## C E R T I F I C A T E

State of Ohio, )  
 ) SS:  
County of Cuyahoga. )

I, Lisa M. Wright, a Notary Public in and for the state of Ohio, do hereby certify that the within-named witness, SHAWN DEWOLF, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given was by me reduced to stenotypy in the presence of said witness, afterwards transcribed by means of computer-aided transcription, and that the foregoing is a true and correct transcript of the testimony so given as aforesaid.

I do further certify that this deposition was taken at the time and place as specified in the foregoing caption, and that I am not a relative, counsel, or attorney of either party, that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D), or otherwise interested in the outcome of this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Cleveland, Ohio, on this day, June 19, 2017.

*Lisa M. Wright*

Lisa M. Wright, Ware Reporting Service, LLC  
21860 Crossbeam Lane, Rocky River, OH 44116  
My commission expires September 14, 2020.